

### REMARKS

This application has been carefully reviewed in light of the final Office Action dated January 6, 2009. Claims 11 to 15 and 21 are pending in the application. Claim 11 is the independent claim. Reconsideration and further examination are respectfully requested.

Claims 11, 12, 15 and 21 were rejected under 35 U.S.C. § 102(e) over U.S. Patent No. 7,369,875 (Kuba). Claims 13 and 14 were rejected under 35 U.S.C. § 103(a) over Kuba and U.S. Publication No. 2002/0149677 (Wright). Claims 11, 12, 15 and 21 were further rejected under § 103(a) over Kuba and U.S. Patent No. 4,236,209 (Lombardo). Claims 13 and 14 were further rejected under § 103(a) over Kuba, Lombardo and Wright. Reconsideration and withdrawal of the rejections are respectfully requested.

Independent Claim 11 generally concerns selective access to a removable storage medium. A storage apparatus includes a first interface unit that has a first port for connection to a first external apparatus, and a second interface unit that has a second port for connection to a second external apparatus. The storage apparatus further includes a third interface unit for connection to a removable storage medium. A control unit controls the first port and the second port, and sets the first port or the second port in a disabled state. If the first interface unit detects that the first external apparatus is connected to the first port, it is determined whether the first external apparatus is capable of accessing the removable storage medium. If the second interface unit detects that the second external apparatus is connected to the second port, it is determined whether the second external apparatus is capable of accessing the removable storage medium.

According to aspects of Claim 11, the first port is not set in a disabled state until it is determined that the second external apparatus connected to the second port is capable of accessing the removable storage medium. Conversely, the second port is not set in a disabled state until it is determined that the first external apparatus connected to the first port is capable of accessing the removable storage medium.

By virtue of this arrangement, it is ordinarily possible to prevent premature and/or unnecessary disabling of a connection to the first or second external apparatus. Specifically, a connection to one apparatus is not disabled until it is determined that the other apparatus can in fact access the removable storage medium.

Referring specifically to claim language, independent Claim 11 is directed to a storage apparatus. The apparatus includes a first interface unit for connection to a first external apparatus, the first interface unit having a first port to which the first external apparatus is connectable and disconnectable and through which the first interface unit connects to the first external apparatus. The apparatus also includes a second interface unit for connection to a second external apparatus, the second interface unit having a second port to which the second external apparatus is connectable and disconnectable and through which the second interface unit connects to the second external apparatus. The apparatus further includes a third interface unit for connection to a removable storage medium. In addition, the apparatus includes a control unit that controls the first port and the second port and sets the first port or the second port in a disabled state. If the first interface unit detects that the first external apparatus is connected to the first port, the control unit determines whether the first external apparatus is capable of accessing the removable storage medium connected to the third interface unit. If the second interface unit detects

that the second external apparatus is connected to the second port, the control unit determines whether the second external apparatus is capable of accessing the removable storage medium connected to the third interface unit. The control unit does not set the second port in the disabled state until the control unit determines that the first external apparatus connected to the first port is capable of accessing the removable storage medium connected to the third interface unit. The control unit does not set the first port in the disabled state until the control unit determines that the second external apparatus connected to the second port is capable of accessing the removable storage medium connected to the third interface unit.

The applied art is not seen to disclose or suggest the features of Claim 11, and in particular is not seen to disclose or suggest at least the features of (i) declining to set a first port in a disabled state until it is determined that a second external apparatus connected to a second port is capable of accessing a removable storage medium, and (ii) declining to set the second port in a disabled state until it is determined that a first external apparatus connected to the first port is capable of accessing the removable storage medium.

As understood by Applicant, Kuba is directed to an electronic camera for sending photographic image data. The electronic camera can connect to a radio telephone line via a serial connector 43, or can connect to a personal computer or modem via a serial connector 44. See Kuba, Abstract, Figure 1 and Column 6, lines 1 to 11.

Page 4 of the Office Action equates Kuba's communication I/F 42 with the claimed first interface unit for connecting to the first serial connector (port) 43, and equates Kuba's converter 26 with the claimed second interface unit for connecting to the second

serial connector (port) 44. Page 4 of the Office Action further equates Kuba's UART switch 41 with the claimed control unit for controlling the ports.

Moreover, page 5 of the Office Action asserts that Kuba (Column 5, line 54 to Column 6, line 11 and Column 7, line 39 to Column 8, line 19) discloses setting a second port in a disabled state responsive to a determination that the first external apparatus is capable of accessing the removable storage medium, and setting the first port in a disabled state responsive to a determination that the second external apparatus is capable of accessing the removable storage medium.

However, Kuba is not seen to decline disabling a port to one apparatus until it is determined that another apparatus can access a removable storage medium.

More specifically, according to the cited portions of Kuba:

"Without any carrier connected to the serial connector 43, however, the UART 25 serves as an ordinary UART for a personal computer or a wired telephone line. Specifically, when a personal computer 5 or a modem 6 (for wired telephone line) is connected to the serial connector 44 without any carrier connected to the serial connector 43, the UART switch 42 [sic, 41] is switched to connect the UART 25 to the serial connector 44 under control of the RISC-CPU 11". Kuba, Column 6, lines 3 to 11.

Thus, according to Kuba, serial connection 44 must first be selected by the UART switch 41 (via converter 26) in order to communicate with a connected personal computer 5 or modem 6. That is, electronic camera 1 can not communicate with personal computer 5 or modem 6 at all until UART switch 41 selects serial connection 44.

It logically follows that in Kuba, selection of serial connector 44 by UART switch 41 must necessarily occur before any communication to determine whether personal

computer 5 or modem 6 (i.e., an “external apparatus”) can access the removable storage medium. Put another way, Kuba disables one port (serial connector 43) by changing UART switch 41 to another port (serial connector 44), and does such disabling before any determination of whether personal computer 5 or modem 6 is in fact capable of accessing the removable storage medium.

In contrast, according to Claim 11, neither the first port nor the second port is set in a disabled state until it is determined that the “other” apparatus is capable of accessing the removable storage medium.

Accordingly, Kuba is not seen to disclose or suggest (i) declining to set a first port in a disabled state until it is determined that a second external apparatus connected to a second port is capable of accessing a removable storage medium, and (ii) declining to set the second port in a disabled state until it is determined that a first external apparatus connected to the first port is capable of accessing the removable storage medium.

Lombardo and Wright have been reviewed and are not seen to remedy the shortcomings of Kuba.

Therefore, independent Claim 11 is believed to be in condition for allowance, and such action is respectfully requested.

The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the claims, however, the individual consideration of each on its own merits is respectfully requested.

No other matters being raised, the entire application is believed to be in condition for allowance, and such action is courteously solicited.

Applicant's undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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